

FILED

MAR - 1 2022

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
SOUTHEASTERN DIVISION

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
CAPE GIRARDEAU

UNITED STATES OF AMERICA,)

Plaintiff,)

vs.) No.

MARVIN R. REMSTER,)

aka: "MARK" R. REMSTER,)

Defendant.)

1:22CR31JAR-ACL

MOTION FOR PRE-TRIAL DETENTION AND HEARING

Comes now the United States of America, by and through its attorneys, Sayler A. Fleming, United States Attorney for the Eastern District of Missouri, and John N. Koester, Jr., Assistant United States Attorney for said District, and moves the Court to order defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of defendant's initial appearance before the United States Magistrate Judge pursuant to Title 18, United States Code, Section 3141, et seq.

As and for its grounds, the Government states as follows:

1. Defendant is charged with Count I, Burglary, in violation of Title 18, United States Code, Section 13(a), and Mo. Rev. Stat. § 569.170; Count II, Theft of Government Property, in violation of Title 18, United States Code, Section 641; Count III, Malicious Damage to Federal Property, in violation of Title 18, United States Code, Section 844(f); and Count IV, Possession of a Firearm and Ammunition by a Convicted Felon, in violation of Title 18, United States Code, Section 922(g)(1).

2. Pursuant to Title 18, United States Code, Section 3142(g), (a) the weight of the evidence against defendant; (b) defendant's history and characteristics; and (c) the nature and seriousness of the danger to any person or the community that would be posed by defendant's release, warrant defendant's detention pending trial.

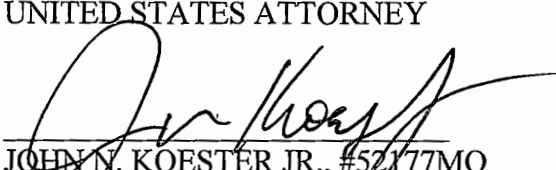
3. There is a serious risk that the defendant will flee.

4. The defendant is a threat to the community.

WHEREFORE, there are no conditions or combination of conditions that will reasonably assure defendant's appearance as required and the safety of any other person and the community and the Government requests this Court to order defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of defendant's initial appearance.

Respectfully submitted,

SAYLER A. FLEMING
UNITED STATES ATTORNEY



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